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Olin CHEMICALS

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May 5, 1993

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VIA FEDERAL EXPRESS

Cheryl W. Smith
Senior Remedial Project Manager
United States Environmental Protection Agency
345 Courtland Street Northeast
Atlanta, Georgia 30365

Re: Submission of Draft Feasibility Study Report
Olin Chemicals/McIntosh Plant Site
McIntosh, Alabama

Dear Ms. Smith:

This letter transmits the draft Feasibility Study (FS) report for the subject site to the Environmental Protection Agency for its review and approval. Olin submits this draft FS report under paragraph VII.F. of the Administrative Order on Consent (AOC), issued by the Environmental Protection Agency and effective May 9, 1990. The draft FS report was prepared for Olin by Woodward-Clyde Consultants, Baton Rouge, LA. The report summarizes the development, screening, and detailed analysis of remedial alternatives for the site per the amended Work Plan, which was approved by the Environmental Protection Agency on July 17, 1991.

The draft FS report includes remedial alternatives that address the Basin in OU-2. EPA indicated at the March 31, 1993, meeting in Atlanta that additional ecological investigation of the Basin and wetlands around it may be required before a remedy could be selected. EPA and Olin have agreed to discuss the scope and timing of this additional ecological investigation. The basis of Basin remedial alternatives presented in the draft FS report could change as a result of additional investigation. Accordingly, the information regarding Basin remedial alternatives should be considered preliminary.

The Baseline Risk Assessment (Section 6 of the draft Remedial Investigation (RI) report for this site, submitted to EPA on February 19, 1993) estimated the overall site cancer risk at 8.3×10^{-5} and the overall site hazard index at 0.47. These estimates indicate that the risk-based remedial action objectives are met by the No Action alternatives. The draft FS report therefore bases the preliminary remedial goals on ARARs. Olin has carefully considered the requirements of CERCLA and RCRA, the alternatives developed by Woodward-Clyde in the draft FS report and offers the following view of the preferred remedy for EPA's use in preparing the Proposed Remedial Action Plan.

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Olin Corporation Suggested Preferred Remedy

Olin suggests that the risks posed by contaminants at the site and ARARs will be appropriately addressed by implementing the following alternatives:

OU-1 Groundwater Alternative C3

Extraction/Treatment/Discharge (implemented in conjunction with extending the existing clay cap over the former CPC plant area to the west)

OU-2 Sediments (Wastewater Ditch) Alternative C1

Containment (Backfill)

OU-1 Groundwater Alternative C3 includes a horizontal extraction well to remove the volume of dense, mercury-containing brine lying stagnantly on the upper surface of the Miocene clay, and a vertical extraction well into the Alluvial Aquifer beneath the old plant (CPC) landfill. Olin would propose to implement this in conjunction with extending the existing clay cap over the former CPC plant area to the west to eliminate any possibility of percolating rain water mobilizing contaminants in the soil in this area.

The existence of the stagnant brine layer was determined by the intensive data evaluation as part of the Source Evaluation Technical Memorandum (SETM) submitted to EPA on November 11, 1991. Olin is required by its RCRA Post-closure Operating Permit to clean-up the Alluvial Aquifer to Maximum Contaminant Levels (MCLs). It is Olin's view that the dissolution of mercury-containing brine from the stagnant layer may impede progress toward meeting MCLs and that the brine should be removed, treated, and discharged.

The SETM and the draft RI report indicated that the soils beneath the old plant (CPC) landfill could be a continuing source of organics to the groundwater. Two factors indicate that the source can be managed by pumping and treating. First, based on the chemical analyses of these soils and the fact that the chlorinated benzenes and mercury, which were the predominant chemicals found, partition more to soil rather than to water, concentrations of contaminants reaching the Alluvial Aquifer would be low. Second, as noted above, Olin is required by permit to operate the RCRA Corrective Action Program until MCLs are achieved, effectively controlling the migration of any and all groundwater contamination at the site. Given these two considerations, it is more appropriate to address contaminants in the soils beneath the old plant (CPC) landfill by ensuring that the low concentrations that may be released from the soils are immediately intercepted and removed, rather than by removing or treating in-place the lightly contaminated soils. The latter remedy would not significantly reduce the already-low risk nor reduce the time to comply with ARARs, and thus is not cost effective.

OU-2 Sediments (Wastewater Ditch) Alternative C1 - Containment (Backfill) includes digging a new wastewater ditch parallel to the existing one, using the excavated soils to fill in the existing ditch. The contaminants in the ditch sediments pose little risk and do not cause non-compliance with ARARs. Olin recognizes that potential erosion of sediments containing an average hexachlorobenzene concentration of approximately 200 mg/kg and mercury concentration of

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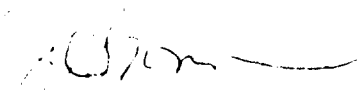
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approximately 20 mg/kg is undesirable. Although it is an expensive alternative, Olin would propose to eliminate the possibility of erosion (and any remote possibility of direct contact for that matter) by covering the existing sediments with clean soil from a new ditch parallel to the existing one.

Olin believes that draft RI and FS reports clearly support the No Action alternative for all other potential sources of releases or threatened releases at the site (not including the Basin as explained in the second paragraph of this letter).

Please let me know if you have any questions regarding this submission.

Sincerely,

OLIN CORPORATION



J. C. Brown
Manager, Environmental Technology

cc: W. A. Beal
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